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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Bernstein & Poisson, a Nevada Corporation,

Plaintiff,

v.

Cynthia Standmore, an individual; JSF
Incorporated DBA Chiropractic Physicians of
Las Vegas; Cameron Medical, Inc.; Coppel
Medical Enterprise LLC DBA Nevada
Comprehensive Pain Centers; United States
Department of the Treasury; State of Nevada,
Department of Health Human Services;
Golden Pear Funding II, LLC, a New York
Limited Liability Company; Preferred Capital
Funding – Nevada, LLC; DOES 1 through
100; ROE Corporations 101 through 200,

Defendants.

Case No. 2:24-cv-01177-APG-EJY

**Stipulation to Extend United States'
Answering Deadline**

(First Request)

This is an interpleader case that the United States removed from Nevada state court on June 27, 2024. Following the United States' removal, counsel for plaintiff Bernstein & Poisson and counsel for the United States held a telephonic meet-and-confer conference regarding various issues in this case. High Stakes Injury Law (formerly Bernstein & Poisson) is in the process of communicating with several defendants regarding the amounts of their liens. Counsel for the United States identified the appropriate point of contact at the United States Department of Health and Human Services and its delegate agency, the Centers for Medicare and Medicaid Services, and is in the process of gathering the facts necessary to answer or otherwise respond to the complaint.

Under Federal Rule of Civil Procedure 81(c)(2)(C), the United States' current deadline to answer or otherwise respond to the complaint is July 4, 2024, which is Independence Day. Because Independence Day is a legal holiday as defined by Rule 6(a)(6)(A), under Rule 6(a)(1)(C), the deadline runs until July 5, 2024, which is the next day that is not a legal holiday.

The parties stipulate that the United States' deadline to answer or otherwise respond to plaintiff's complaint will be extended by one month, or from July 5, 2024, to August 5, 2024. The purpose of the stipulation is to allow the United States adequate time to investigate the facts before answering or otherwise responding to the complaint. Also, the additional time will allow the parties an opportunity to continue their meet-and-confer efforts regarding the various parties' interests in this case, which should streamline the litigation. This is the first stipulation to extend time for the United States to answer or otherwise respond to the complaint.

IT IS SO STIPULATED.

Dated: July 2, 2024

AMBER N. KING
High Stakes Injury Law

/s/ Amber N. King
Attorney for Plaintiff

Dated: July 2, 2024

JASON M. FRIERSON
United States Attorney

/s/ Lindsay Ager
LINDSAY AGER
Assistant United States Attorney

IT IS SO ORDERED.


United States Magistrate Judge

Dated: July 2, 2024